

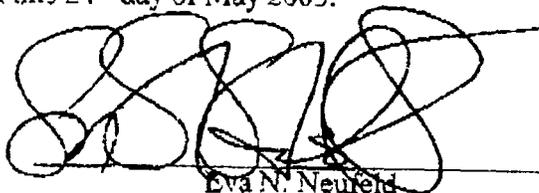
4. The Northern Border interstate pipeline business segment includes companies that provide natural gas transmission services in the midwestern United States. Our interstate pipelines transport gas for shippers under tariffs regulated by the Federal Energy Regulatory Commission ("FERC"). The interstate pipelines do not own the gas that they transport and therefore do not assume natural gas commodity price risk for quantities. The interstate pipelines that we own are Midwestern Gas Transmission Company, Viking Gas Transmission Company, a 33.33% interest in Guardian Pipeline, L.L.C. and a 70% general partner interest in Northern Border Pipeline Company. Northern Plains Natural Gas Company provides operating services to Midwestern Gas Transmission Company, Viking Gas Transmission Company and Northern Border Pipeline Company pursuant to operating agreements.
5. The Northern Border natural gas gathering and processing segment provides services for the gathering, treating, processing and compression of natural gas and the fractionation of natural gas liquids for third parties and related field services. We do not explore for, or produce, crude oil or natural gas and do not own crude oil or natural gas reserves. The companies that we own in this segment are Bear Paw Energy, LLC, Border Midstream Services, Ltd, a Canadian company, and through our wholly-owned subsidiary, Crestone Energy Ventures, L.L.C. we own a 49% interest in Bighorn Gas Gathering, L.L.C., a 33.33% interest in Fort Union Gas Gathering, L.L.C. and a 35% interest in Lost Creek Gathering, L.L.C. NBP Services Corporation, an Enron subsidiary, provides operating services for our natural gas gathering and processing segment.
6. The Northern Border coal slurry pipeline segment is comprised of our ownership of Black Mesa Pipeline, Inc., the only coal slurry pipeline in operation in the United States.
7. To the best of my knowledge, documents regarding the business of Northern Border and its business entities were in the possession of Enron Corp. due to Enron's ownership interest in Northern Border and the operation of some of Northern Border's entities by Northern Plains Natural Gas Company and NBP Services Corporation, both Enron subsidiaries, as I have described above.
8. All or a portion of those Northern Border documents were included in the documents either seized by the various government agencies investigating Enron or produced by Enron in response to numerous subpoenas and investigations. Northern Border had no control over the documents so seized and produced. Northern Border had no knowledge of the seizure and production of its documents. Until recently, Northern Border had no knowledge that its documents were included in the document depository in this proceeding.
9. Ms. Johanna Wiersig, an Enron representative, advised on April 25, 2003 that an Order by the Court in this proceeding had been issued denying Enron's motion for a confidentiality order and that all documents previously produced to federal government agencies or Congress were to be made public as of May 26, 2003 unless affidavits as to privilege and

- confidentiality were provided to the Court. Ms. Wiersig further advised that the e-mail box and H: drive of the work computer of one of the officers of Northern Plains Natural Gas Company had been produced to government agencies at some point during the Enron investigations, and therefore would be made public unless otherwise protected.
10. Ms. Wiersig described a process whereby the document depository would be searched electronically using search words to locate and identify confidential documents for which affidavits were to be prepared and submitted to the Court. Ms. Wiersig requested that we submit a list of search terms to her. On April 30, 2003, I submitted to Ms. Wiersig a list of search terms related to Northern Border and its affiliates. On May 5 Ms. Wiersig informed me that these search terms resulted in the identification of 439,534 depository documents. It is my understanding that these documents are included in the 25% of depository documents characterized as presumptively confidential by Enron.
 11. The actual review of the depository documents requires the issuance of a password allowing a person access to the documents. I received passwords and an explanation of the computer system on May 9, 2003. To comply with the instructions provided to me by Ms. Wiersig, Northern Border instituted the following procedure: Upon review of a document, it is marked electronically as "confidential" or "not confidential". If it is marked "confidential," the reviewer provides a description of the document. This information is then saved and at the conclusion of the review a log is to be produced as a result of the review. The information on the log is intended to provide the information necessary to prepare the affidavits for the documents. Review of the Northern Border documents began on May 12, 2003 and, thus far, we have been able to review approximately 9,400 documents of the 439,534 documents identified as containing the Northern Border search terms. Suzanne Franco, Business Development Analyst II, Pam Powers, Treasury Specialist, and I have spent approximately 190 hours reviewing the documents.
 12. In my opinion, Northern Border has made its best effort to review the documents in the time allowed so that affidavits could be prepared to submit to the Court seeking protection for confidential and privileged documents. Given the amount of time to conduct such a review and the overwhelming size of the review, Northern Border has not been able to complete the review of documents.
 13. Northern Border has not filed for bankruptcy and, likewise, none of its business entities have filed for bankruptcy. I am unaware of any proceeding or allegation that contends that Northern Border unlawfully contributed to the demise of Enron. To the best of my knowledge, neither Northern Border nor any of its business entities are the subject of any governmental investigation of Enron. I therefore fail to see how confidential documents relating to Northern Border could be pertinent to the Enron debacle or the investigations and litigation related thereto.

14. The growth and development of the businesses previously described is a primary objective of Northern Border. It is clear to me that, the disclosure of commercially sensitive documents will certainly compromise and harm the business of Northern Border. For example, information related to the commercial terms of transactions, drafts of settlement agreements, the models used for the financial analysis of assets, and documents such as memos related to analysis of pending litigation or the evaluation of potential liability are examples of documents, that if made available to the public, will be harmful to and damage the value of Northern Border.
15. In addition to the growth and development of these business segments, Northern Border desires to continue to acquire complementary businesses and regularly evaluate various acquisition opportunities wherein the sellers require us to enter into confidentiality agreements prior to reviewing their proprietary information. Northern Border is obligated to maintain the confidentiality of these evaluation materials provided by the sellers and is responsible for a breach of that confidentiality. Search terms submitted to the document depository in relation to these acquisition projects resulted in the identification of 159,141 documents. It is an unacceptable risk of liability to Northern Border and to the sellers of these businesses, both being innocent third parties, that this confidential information be disclosed to the public.
16. I have personally reviewed the following documents contained in the depository, which I offer as further examples of confidential material, the disclosure of which would be harmful to Northern Border and other third parties: (i) a proposed Purchase and Sale Agreement identifying the parties and proposed terms connected with the acquisition of a particular asset (ii) an index of data room material prepared by a seller's investment banker/transaction manager, which index was marked "Highly Confidential" and contained specific information regarding the asset and (iii) a description of the due diligence activities and analysis noted as "Privileged and Confidential" that discloses the identity of the seller, the buyer and the subject asset.

FURTHER AFFIANT SAITH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 24th day of May 2003.



Eva N. Neufeld